

1 DURIE TANGRI LLP
2 RAGESH K. TANGRI (SBN 159477)
rtangri@durietangri.com
3 CLEMENT S. ROBERTS (SBN 209203)
croberts@durietangri.com
4 LAUREN E. KAPSKY (*admitted pro hac vice*)
lkapsky@durietangri.com
5 TIMOTHY P. HORGAN-KOBELSKI (SBN 319771)
tkobelksi@durietangri.com
217 Leidesdorff Street
6 San Francisco, CA 94111
Telephone: 415-362-6666
7 Facsimile: 415-236-6300

8 Attorneys for Plaintiff COLLATERAL ANALYTICS, LLC

9 MCKOOL SMITH, P.C.
10 ROBERT M. MANLEY (*admitted pro hac vice*)
rmanley@mckoolsmith.com
11 ASHLEY MOORE (*admitted pro hac vice*)
amoore@mckoolsmith.com
300 Crescent Court, Suite 1500
12 Dallas, TX 75201
Telephone: 214-978-4000
13 Facsimile: 214- 978-4044

14 MCKOOL SMITH, P.C.
15 LAWRENCE M. HADLEY (SBN 157728)
lhadley@mckoolsmithhennigan.com
One California Plaza, 300 South Grand Ave., Suite 2900
16 Los Angeles, CA 90071
Telephone: 213-694-1200
17 Facsimile: 213-694-1234

18 Attorneys for Defendants NATIONSTAR MORTGAGE, LLC,
XOME SETTLEMENT SERVICES LLC, AND QUANTARIUM, LLC

19 IN THE UNITED STATES DISTRICT COURT

20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21 SAN FRANCISCO DIVISION

22 COLLATERAL ANALYTICS, LLC,

23 Plaintiff,

24 v.

25 NATIONSTAR MORTGAGE LLC,
26 XOME SETTLEMENT SERVICES LLC, and
QUANTARIUM, LLC,

27 Defendants.

28 Case No. 3:18-cv-00019-RS

JOINT SUBMISSION OF SUPPLEMENTAL INFORMATION RE: SEALED DOCUMENTS PURSUANT TO ECF NO. 53 AND [PROPOSED] ORDER

Ctrm: 3, 17th Floor

Judge: Honorable Richard Seeborg

At the Initial Case Management Conference held in this case on April 19, 2018, the Court ordered the parties to submit supplemental information to summarize their positions on which documents filed to date warrant sealing. The parties state as follows:

- ***ECF No. 1, Complaint.*** The parties agree that this document does not warrant sealing, and the administrative motion to file under seal (ECF No. 3) is withdrawn. Accordingly, the parties submit the Complaint without redactions as Exhibit A hereto, to replace the Complaint at ECF No. 1.
- ***ECF No. 8, Corporate Disclosure Statement.*** Page 1, lines 2–4 of this document contain the identities of the Plaintiff’s investors, which are not publicly known. Plaintiff submits that Plaintiff is a closely held, private company organized as a limited liability company under the laws of Hawaii. Plaintiff has taken and continues to take measures to keep its investors’ identities confidential, and submits that there is good cause to maintain the identities of those investors under seal in this case. As set forth in a declaration from Plaintiff’s Chief Executive Officer (ECF No. 8-2), Plaintiff contends that this content should be sealed to protect its members from annoyance or harassment, including unwanted contact and solicitation for investment by Plaintiff’s competitors, and to protect these investors’ privacy interests. Defendants have no position on whether this content should be sealed. Plaintiff submits that this administrative motion to file under seal (ECF No. 8) should be granted for good cause shown.
- ***ECF No. 31, Exhibits to Motion to Dismiss.*** The exhibits to Ms. Moore’s declaration in support of Defendants’ motion to dismiss consist of Defendants’ contracts with Plaintiff. Specifically, Exhibit B (ECF No. 31-4) is Nationstar Mortgage LLC’s Master Services Agreement with Plaintiff, and Exhibit C (ECF No. 31-6) is Xome Settlement Services LLC’s Master Services Agreement with Plaintiff. These contracts include the prices that Plaintiff charged Defendants, which is commercially sensitive information that is not publicly known, as well as contact information for party representatives and federal tax ID information. As set forth in a declaration from Ms. Moore (ECF No. 31-1), this information constitutes confidential details of the business relationship between the

1 parties. The parties therefore agree and submit that there is good cause to maintain the
2 confidentiality of the pricing information, contact information, and federal tax ID
3 information. The parties further agree that none of the remaining content in these exhibits
4 warrants sealing. Accordingly, the parties submit the attached versions with only the
5 limited redactions set forth above: Exhibit B hereto to replace ECF No. 31-4 and Exhibit
6 C hereto to replace ECF No. 31-6. This administrative motion to file under seal (ECF No.
7 31) should be granted as set forth in this paragraph for good cause shown.

8 Dated: May 4, 2018

DURIE TANGRI LLP

9 By: _____ */s/ Lauren E. Kapsky*
10 LAUREN E. KAPSKY

11 Attorney for Plaintiff
12 COLLATERAL ANALYTICS, LLC

13 Dated: May 4, 2018

MCKOOL SMITH, P.C.

14 By: _____ */s/ Ashley M. Moore*
15 ASHLEY M. MOORE

16 Attorney for Defendants
17 NATIONSTAR MORTGAGE, LLC, XOME
18 SETTLEMENT SERVICES LLC, AND
19 QUANTARIUM, LLC

FILER'S ATTESTATION

20 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Lauren E. Kapsky, attest that concurrence
21 in the filing of this document has been obtained.

22 Dated: May 4, 2018

_____ */s/ Lauren E. Kapsky*
23 LAUREN E. KAPSKY

[PROPOSED] ORDER

PURSUANT TO THE PARTIES' SUBMISSION, IT IS SO ORDERED.

24 Dated: _____

25 _____ RICHARD SEEBORG
26 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2018 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Lauren E. Kapsky

LAUREN E. KAPSKY